## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Alexandria Division)

ASSOCIATED RECOVERY, LLC,	)
Plaintiff,	) )
v.	) Case No. 1:15-cv-01723-AJT-JFA
JOHN DOES 1-44,	)
Defendants in rem.	) )

## DEFENDANT'S MOTION TO SET ASIDE DEFAULT JUDGMENT REGARDING YTE.COM

Domain Capital, LLC ("Domain Capital") and Defendant YTE.com, pursuant to Federal Rule of Civil Procedure 60(b), hereby request to set aside the Judgment entered on May 18, 2016 [ECF 43]. Pursuant to Local Civil Rule 7(E), counsel for Defendant called Plaintiff's counsel in an attempt to meet and confer in good faith with Plaintiff regarding this Motion. At the time of this filing, counsel for Plaintiff did not consent to this Motion.

The basis for this motion is set forth more fully in the accompanying Memorandum in Support of Motion to Set Aside the Default Judgment.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion and set aside the Judgment entered on May 18, 2016, 2016 (ECF 43) and order Uniregistrar Corp., the current registrar of the YTE.com domain name, to take all steps within its power to transfer the domain back to Domain Capital.

Dated: June 17, 2016

## /s/ Eric Y. Wu

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Counsel for Defendant

Respectfully submitted,

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 17th day of June, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Dated: June 17, 2016

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